

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
U.S. DISTRICT COURT
DISTRICT OF MASSACHUSETTS
2005 JUL 27 AM 11:00

UNITED STATES OF AMERICA)
)
vs.) No. 04-30055-MAP
)
KACEY JONES)

MOTION FOR FUNDS (THIRD REQUEST)

Now comes the defendant and respectfully requests this Honorable Court allow him to retain a private investigator to assist in the preparation of this matter. The defendant requests an amount not to exceed \$1000.00 to retain forensic investigative services - Lewis Gordon Investigations. A prior motion was allowed for funds and that amount has been exhausted. As grounds for this request defendant states he was arrested when police entered into an apartment where several people were present. Individuals must be interviewed about the manner of police entry and the scope of the police search of the apartment; other matters related to a motion to suppress need to be investigated and statements must be taken from the individuals to establish the defendant's standing.

Since the first motion was allowed the investigator located several witnesses who were in the apartment including arranging for counsel to interview at least one of those witnesses. Photographs have also been taken of the scene as well as a detailed investigation which continues regarding establishing the defendant's standing as affected by his expectation of privacy in the apartment.

THE DEFENDANT

BY:



Mark G. Mastroianni, Esq.

95 State Street, Suite 309

Springfield, Ma. 01103

(413) 732-0222

BBO #556084